

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
	:	
Alessandro B. Micozzi	:	
Kristi M. Micozzi	:	Case No.: 19-13556(MDC)
	:	
Debtor(s)	:	Chapter 13

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtors, Alessandro and Kristi Micozzi, by and through their undersigned counsel, hereby move to modify their Chapter 13 Plan and in support thereof aver as follows:

1. Debtors filed a Chapter 13 Bankruptcy on or about May 31, 2019.
2. The Chapter 13 filing was assigned case number 19-13556(MDC).
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about December 19, 2019.
4. On or about April 8, 2020, the mortgagee, Wilmington Trust, National Association, not in its individual capacity, but solely as trustee for MFRA Trust 2014-2 (hereinafter referred to as "Wilmington Trust"), filed a Motion for Relief from Stay for the premises located at and known as 306 Harvard Avenue, Broomall, PA 19008.
5. On or about May 6, 2020, a hearing was held and an Order to be entered to resolve the Motion for Relief filed by Wilmington Trust. A true and correct copy of the May 6th Order is attached hereto as **Exhibit "A."**
6. In accordance with the May 6, 2020 Propose Order, the Debtors will cure the subject \$12,967.82 by amending the Chapter 13 plan by or before May 19, 2020.

7. In furtherance of the Order and the Debtors curing the post-petition delinquency, this Motion and Modified Chapter 13 Plan are being contemporaneously filed.

8. The Debtors' proposed modified Chapter 13 Plan, attached hereto as "**Exhibit B**", is affordable to the Debtors.

WHEREFORE, the Debtors request that they be permitted to modify their Chapter 13 Plan for the above-stated reasons.

Dated: May 13, 2020

/s/Brad J. Sadek, Esq
Brad J. Sadek, Esq.
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